

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

EVELYN WILLIAMS, <i>Plaintiff,</i> vs. BARTON MALOW CO., et al. <i>Defendants.</i>	Case No. 3:20-CV-02594-JGC Judge James G. Carr
JOINT PROPOSED CASE SCHEDULE	

As requested in this Court's October 20, 2022 non-document order, the parties have conferred about their discovery needs, compared calendars, and agreed to participate in an initial settlement conference (and/or a private mediation) following limited discovery. The parties' counsel also discussed their rather intense discovery schedules in other cases and their other professional commitments over the next few months, as well as the intervening holiday season, and have agreed to propose a somewhat-extended case schedule to accommodate these circumstances. The parties thus propose the following schedule for the completion of fact discovery, exchange of expert reports, conduct of expert depositions, and submission of dispositive motions:

- Completion of fact discovery – April 28, 2023
- Plaintiff's expert report(s) – May 26, 2023
- Defendants' expert report(s) – June 23, 2023
- Plaintiff's expert rebuttal report – July 7, 2023
- Completion of expert discovery – July 28, 2023
- Dispositive motions – August 25, 2023

Dated: November 4, 2022

/s/ David Campbell (per email consent)

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